



RCAP-RECEIVED

AUG 23 2010

August 18, 2010

Ms. Christine Kump-Mitchell  
Project Coordinator, Hazardous Waste Program  
MDNR St. Louis Regional Office  
7545 S. Lindbergh, Suite 210  
St. Louis, MO 63216

File

Re: Modine Manufacturing Company – Camdenton, MO  
Quarterly Report for period ending June 30, 2010  
AOC No. 99-HW-002

Dear Ms. Kump-Mitchell:

The following is a summary report of the activities completed from April 1, 2010 through June 30, 2010 at the above referenced site. This report is being submitted as required by the Corrective Action Abatement Order on Consent, Order No. 99-HW-002 (AOC) paragraphs 91 through 94.

**Description of work completed during the quarter:**

On May 6, 2010, a teleconference was held with the Missouri Department of Natural Resources (MDNR) (B. Stuart, C. Kump-Mitchell), Modine (T. Meitner), and CH2M Hill (M. Martin) to discuss Modine's response to MDNR's March 22, 2010 letter. The topics of discussion included the following:

- It was agreed that Modine would revise the RFI Report upon its re-submittal to specify the new property owner and to clarify that there are no other deed restrictions for this property.
- MDNR indicated that they, and the USEPA, were agreeable to Modine's proposed approach for indoor air sampling which would mirror the 2003 sampling event. It is Modine's intent that this newly obtained data will be evaluated using the recently adopted New York State Department of Health (NYSDOH) standards for TCE indoor air toxicity. The new indoor data would be incorporated within a revised RFI Report in lieu of the 2003 data. This would allow the site closure process to proceed to completion. Modine indicated that they would submit a Quality Assurance Project Plan (QAPP) for indoor air sampling to MDNR. Mr. Stuart indicated that he would expedite MDNR's review of the plan internally as well as with USEPA Region VII.
- MDNR indicated that it was not necessary to resubmit a revised RFI Report at this time as requested in the March 22, 2010 MDNR letter. Rather, a letter from Modine indicating its plans for indoor air sampling activities would satisfy as a response.

On June 6, 2010, Modine retained CH2MHill to conduct indoor air sampling and reporting in accordance with the scope of work described in the QAPP.

On June 21, 2010, Modine submitted responses to MDNR and USEPA comments provided in MDNR's March 22, 2010 letter to Mr. B. Stuart of MDNR, and requested MDNR and USEPA to review the responses to comments to determine whether the responses satisfy the outstanding concerns. The submittal also included the draft QAPP for indoor air sampling and requested MDNR's and USEPA's comments and expeditious approval of the sampling plan.

**Summary of findings, data, etc.:**

Improvements to area-wide groundwater wells, including some wells located on-site, were completed by UTC's consultant Stantec in late 2009. Those corrective measures were conducted in response to MDNR's Groundwater Operation and Maintenance Inspection Report dated September 2009. B. Barquest of UTC indicated that the corrective measures satisfied the deficient items identified in the Inspection Report.

**Summary of problems or potential problems and any corrective measures implemented:**

No problems were encountered during the quarter being reported.

**Projected work for the next reporting period:**

At the close of Q2, Modine was awaiting MDNR's and USEPA approval of the QAPP for the indoor air sampling per Modine's June 21, 2010 letter. Once approved, Modine will schedule the indoor air sampling event.

Indoor air sampling results are expected in Q3, followed by CH2M Hill's evaluation of the findings and preparation of a final report to be submitted to MDNR.

**Instances of Non-compliance with the requirements of the Order:**

There were no instances of non-compliance with the requirements of the Order during this reporting period.

If you have any questions concerning this report, please contact Mr. Thomas E. Meitner, EH&S Manager at (262) 636-1412, or by email at [t.e.meitner@modine.na.com](mailto:t.e.meitner@modine.na.com).

Sincerely,



David L. Lidester  
Regional Services Director – Americas

Cc: Modine Manufacturing Company – Camdenton  
D. Garrett – EPA Region VII  
S. Poplawski – Bryan Cave, LLP  
M. Martin – CH2MHill  
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File

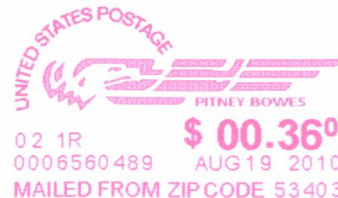


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*ADDRESS SERVICE REQUESTED*

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